

FILED
DISTRICT COURT OF GUAM

UNITED STATES DISTRICT COURT

for the

SEP 09 2019 *cmc*

District of

JEANNE G. QUINATA
CLERK OF COURT

Division

Washington D.C. Seattle
Manufacturing Inc.
Jaydeen Catherine Delacruz

Case No. CV-18-00038

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

-v-

Bank of Guam Santa Cruz Branch
Bank Pacific Aspinall Avenue Hagatna Branch
Bank of Hawaii 2ND FLR. OF BOH BLDG. Hagatna Branch
First Hawaiian Bank Maite Branch

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**COMPLAINT FOR A CIVIL CASE ALLEGING THAT THE
DEFENDANT OWES PLAINTIFF A SUM OF MONEY**

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Jaydeen Catherine Delacruz

P.O. BOX 5484

Hagatna Guam, 96932

671-565-2861

jaydeendebcruz27@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (*if known*)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (*if known*)

Bank of Guam
Richard Bevenvente
Santa Cruz Branch
Hagatna
Guam, 96932
671-472-5300
Bankofguam.org

Defendant No. 2

Name
Job or Title (*if known*)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (*if known*)

Bank Pacific
Supervisor Mr. Arriola
151 Aspinall Avenue
Hagatna
Guam, 96910
671-479-1147
Bankpacific.org

Defendant No. 3

Name
Job or Title (*if known*)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (*if known*)

Bank of Hawaii
Supervisor Micheal
134 W Soledad Avenue
FL-2 of BOH BLDG.
Hagatna Branch
1-877-553-2424
BankofHawaii.org

Defendant No. 4

Name
Job or Title (*if known*)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (*if known*)

First Hawaiian Bank
Supervisor
Maite Branch
406 Route 8 Mong Mong Gu
96910
1-888-643-4343
FHB.org

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) Jaydeen Catherine Delacruz, is a citizen of the State of (name) Guam.

2. If the plaintiff is a corporation

The plaintiff, (name) Jaydeen Catherine Delacruz is incorporated under the laws of the State of (name) Guam, and has its principal place of business in the State of (name) Guam.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) BANK of Guam, is a citizen of the State of (name) Guam. Or is a citizen of (foreign nation) Saipan.

2. If the defendant is a corporation

The defendant, (name) BANK of Guam, is incorporated under the laws of the State of (name) Guam, and has its principal place of business in the State of (name) Guam. Or is incorporated under the laws of (foreign nation) Saipan, and has its principal place of business in (name) Guam.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Because defendants have no Jurisdiction
no Authority ; no power.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The defendant, (name) Bank of Guam, owes the plaintiff (specify the amount) \$ 980, because (use one or more of the following, as appropriate):
hundred zillion thousand dollars.

A. On a Promissory Note

On (date) Dec 29, the defendant signed and delivered a note promising to pay the plaintiff
on (date) Jan 04 the sum of (specify the amount) \$ 980 hundred zillion thousand
of (specify the amount) 33.1 percent. The defendant has not paid the amount due and owes
(state the amount of unpaid principal and interest) \$ 1,303.40 hundred zillion thousand
exhibit or is summarized below. (Attach the note or summarize what the document says.)
exhibit A invoice of \$980 thousand dollars
for Non-Sufficient Funds was returned for a
deposit. (NSF) then referred to maker of the
check.

B. On an Account Between the Parties

The defendant owes the plaintiff (specify the amount) \$ 980 hundred zillion thousand
account between the parties, based on (state the basis, such as an agreement between a credit-card company and a
credit-card holder) on an agreement to furnish information
then to pay-out the amount of \$980 hundred
zillion thousand dollars. for an approved and
sufficient amount on a credit card visa/mastercard.
The plaintiff sent the defendant a statement of the account listing the transactions over a certain period
and showing the bills sent, the payments received or credits approved, and the balance due. The
defendant owes (specify the amount) \$ 980 hundred zillion thousand dollars.
attached as exhibits or summarized below. (Attach the statements or summarize what they say.)

Credit cards have not be paid.
Cards of VISA/MASTER CARD has not be approved
for Sufficient Funds. The defendant owes
\$980 hundred zillion Thousand dollars for
returned deposit of these amounts.

C. For Goods Sold and Delivered

The defendant owes the plaintiff (specify the amount) \$ 980 hundred zillion Thousand for goods sold and delivered
by the plaintiff to the defendant from (date) Dec 29 to (date) Jan 04 dollars.

D. For Money Loaned

The defendant owes the plaintiff (specify the amount) \$ 980 hundred zillion Thousand for money the plaintiff loaned
the defendant on (date) Dec 29 dollars.

E. For Money Paid by Mistake

The defendant owes the plaintiff (specify the amount) \$ 980 hundred zillion Thousand for money paid by mistake to
the defendant on (date) Dec 29, when the defendant received the payment from (specify who
paid and describe the circumstances of the payment) Bank of Guam owes the plaintiff \$980 zillion
Thousand dollars. Because it was paid by
mistake in a form of payment of a creditcard
Transaction.

F. For Money Had and Received

The defendant was paid money (specify the amount) \$ 980 hundred zillion Thousand on (date) Jan 04 by
(identify who paid and describe the circumstances of the payment) Money had been recieved by the defendant
and I forced to pay the amount of
\$980 hundred zillion thousand dollars which defendant
It is unjust for the defendant not to pay the plaintiff the money received because (explain the reason, such as duress?
that the money was intended to be paid to the plaintiff, or was paid by coercion, duress, or fraud, or was an overpayment or a
deposit to be returned)

Money was recieved by the plaintiff is caused
by coercion, duress and overpayment of a
deposit to be returned. For None-Sufficient Funds.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

To come in the bank to open a new account. Then to collect money owed to plaintiff for a credit card exclusive of all discounts, at any retail store. Credit cards should be a Visa/Mastercard should be approved and secured with sufficient funds. available to plaintiff immediately. Then to send the credit cards in the mail any place bank. Then to activate cards by calling over the phone.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 30 August 2019

Signature of Plaintiff

Printed Name of Plaintiff

Jaydeen Catherine Delacruz
Jaydeen Catherine Delacruz

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Jaydeen Catherine Dela Cruz

P.O. Box 5484 Hagatna Guam, 96932

(671)565-2861 H (671)477-9866 W

CV-18-00038

Washington D.C. Seattle Manufacturing INC.)

Collection of sum of money

Jaydeen Catherine Dela Cruz)

with damages

)

VS.)

Bank of Guam Santa Cruz Branch Hagatna)

Bank Pacific Aspinall Avenue Hagatna Branch)

Bank of Hawaii 2 FLR of BOH BLDG. Hagatna Branch)

First Hawaiian Bank Maite Branch)

IN THE UNITED STATES

DISTRICT COURT OF GUAM

COMES NOW, plaintiff Washington D.C. Seattle, Manufacturing Inc. Jaydeen Catherine Dela Cruz is self-represented and is likewise plaintiffs legal Counsel in this case, and before this honorable court , most respectfully states that:

1. Plaintiff Washington D.C. Seattle Manufacturing Inc. Jaydeen Catherine Dela Cruz is of legal age, single with (4) children, a citizen of Guam and with residence at the village of Agat Guam, 96928 and who may be served with orders, resolutions and other processes of the honorable court at the office of her counsel.
2. The Plaintiff and defendant have a capacity to sue and be sued.
3. Plaintiff and owner / manager of her company Washington D.C. Manufacturing INC. Jaydeen Catherine Dela Cruz services operating in the Island of Guam with Senator's office (Guam Lagislature)

4. That on April 2017 the defendant secured the services of the plaintiff's office at the place of business of the defendant.

5. Defendant then was required to pay for the salaries of the plaintiff assigned to the office of the defendant as evidence by the contact of services and a promissory note.

6. That in the beginning, the defendant religiously paid the salaries of the assigned plaintiff to them by delivering the amount to the plaintiff

7. That despite of sent letter of demand which was repeated by oral demands the defendant failed to pay the sum of money of \$980 hundred zillion thousand dollars, in which is relief for the plaintiff.

8. Jurisdiction in this case is based on diversity of a citizenship of the parties and the amount in controversy. Plaintiff Jaydeen Catherine Dela Cruz is a citizen of Guam. Defendant is a citizen of Guam. The amount in controversy exceeds the sum of Seventy Five Thousand Dollars (\$75, 000) exclusive of interest and cost.